

IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

JOHN RICHARD JAE

Plaintiff,

vs.

KENNETH D. KYLER, et al.

Defendants.

FILED
HARRISBURG

JUN 27 2001

MARY E. D'ANDREA, CLERK

Per DEPUTY CLERK

Judge Rambo

Magistrate Judge Sm

MOTION TO COMPEL DISCOVERY

The Plaintiff John Richard Jae moves this Court pursuant to Rules 33(b)(4) & (5), 34(b) & 37(e), Fed. R. Civ. P., for an order compelling the defendants to answer in full, Interrogatory No. 18 of Plaintiff's second set of interrogatories and produce for inspection and copying the documents in the Plaintiff's Third Request For Production of Documents on April 22, 2001, herein this case.

This motion is based upon the papers and files in this case and upon the Plaintiff's accompanying Affidavit in support of Motion To Compel Discovery and Exhibits attached thereto, submitted hereto.

RESPECTFULLY SUBMITTED

(s) John Richard Jae
MR. JOHN RICHARD JAE

#BQ-3219

SCI-Greene/SMU

175 Progress Drive

Waynesburg, PA 15370

Dated: 21.56 JUNE 2001

Plaintiff and its co.

IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

~~JUDGE'S COPY~~

JOHN RICHARD STAS
Plaintiff,

vs.

KENNETH D. KYLER, et al.,
Defendants.

FILED
HARRISBURG, PA

JUN 27 2001

MARY E. D'ANUHEA, CLERK
Per

Civil No. 1:00-CV-00315
U.S. District Judge Ramo
Magistrate Judge Smyer

PLAINTIFF'S THIRD REQUEST FOR PRODUCTION OF DOCUMENTS

Plaintiff John Richard Stas, pursuant to Rule 34(b), Fed. R. Civ. P., his third Request for Production of Documents herein the above entitled captioned case, and Requests that the produce all of the Documents listed, herein, below ~~to~~ within thirty (30) day of receipt of this Request by providing the Plaintiff with entire copies of the documents or by producing all of such for Plaintiff's inspection and copying.

1. Any and all Request Forms written by Plaintiff to Defendants Kyler and/or Paula Kovach, during the months of November and December, 1999, about the denial of his own personal religious materials, showers and outside exercise in the about excessive heat/overventilation problems in the RH about the Plexiglass shield being placed over the Plaintiff's Door.

2. Any and All letters which the Plaintiff wrote to the Deputy Secretary of Corrections Board and/or to Deputy's Connections William Lane concerning the denials of his personal law books & religious materials, showers and exercise in the SCI-Camp Hill RHU and/or about excessive heat/overventilation about the Plexiglass shield.

1999; and the written replies sent to this Inmate Plaintiff on such letters.

3. A copy of each of the DC-141 PART III 30 DAY PRC REVIEW Papers on this Plaintiff for the months of December 1999, and January, February, March, April & May, 2000.

4. An entire copy of the SCI-Camp Hill General Rules Regulations For RHU as put out by Defendant Deputy Superintendent Bilakovich in either August or September.

5. A copy of any and all work orders that was turned in to the RHU concerning any and all problems with the heating system during the months of November & December, 1999.

SUBMITTED BY:

(S) John Richard Jae
 MR. JOHN RICHARD JAE
 BQ-3219
 SCI-Greene/SMU
 175A Greene Drive
 Waynesburg, PA 15370

Dated: 22nd APRIL 2001:

U'ge vs. Kylan, et al.,
 CIV No. 1-00-0315
CERTIFICATE OF SERVICE

I certify under the penalty of perjury that on 6/22/01, I mailed to the person listed below, a true & correct carbon copy of each of Plaintiff's Motion to Compel Discovery, Brief in Support of Motion to Compel Discovery, Amended Motion for Stay And Amended Brief in Support and [REDACTED] Brief in Reply to Defendants' memorandum of Opposition to Plaintiff's Motion to Correspond with Another Inmate by U.S. 1st Class Mail, Postage prepaid & addressed to:

MR. Michael L. Harvey, SDAG,
 Office of the Attorney General of Pennsylvania
 15th Floor - Strawberry Square
 Harrisburg, PA 17120

I certify under the penalty of perjury that on 6/22/01 I gave prison officials here for mailing to this Court, the originals of each above-named documents.

This Certificate of Service is made pursuant to & under 28 U.S.C.

Dated/Executed on:
 22nd JUNE 2001:
 At: Waynesburg, Pennsylvania:

(S) John Richard
 MR. JOHN RICHARD
 #BO-3219
 SOI - Greene County
 175 Progress Drive
 Waynesburg, PA 153
 Plaintiff and Pro Se C